

EXHIBIT 12

Skip 2 and 6

1. Identify all persons who have knowledge of the facts and circumstances relating to the claims or defenses in this action and include a brief description of their knowledge. Please include any and all witnesses to the alleged discriminatory and/or retaliatory acts by Defendant.

RESPONSE: unless indicated phone numbers place of work etc are unknown, the persons whom I currently know of include:

Steve Brown(?)-Made comments which I categorize as racist: comments in the electrical engineering group chat about Omar Being lazy for taking PTO in comparison to a white team member, jokes in the product introduction team group chat about omar's use of PTO, and asking my whereabouts from Rob.

Diana Wilmes- worked directly under Judy as HR assistant. Privy to performance evaluations, interview evaluations, hiring decisions and compensation for different employees. Worked with recruiters, made most complaints about my attendance and timesheets.

Judy Talis- acting administrative officer during majority of my employment with defendant. Knowledge of my racial complaints, sexual complaints, disability complaints, escalation of complaints to PHRC and nature of my work.

Sam Gallagher-

Jorge Rive- witness to some off color statements and jokes related to sex or race made by sam during some lunches, and occasionally heard these statements when sam would visit my workdesk. I complained about Jorge aggressively pressing me for details of my "Whereabouts" as relevant to the hostile work environment created by racial harassment/discrimination.

Julian Jackson- witness to statements by visiting investor regarding racial hiring practices, witness to brian kennney's behaviors and outburst towards me, recipient of specific work rules and guidelines which I had earlier identified as problematic, witness to another employees comments made about race during their discussion of Dylan Roof trial.

Omar Jackson- first and only promoted black employee in defendant's history, originally denied senior title due to "employment gap". Also experienced scrutiny from HR and comments from coworkers. Present for a deal of criticism I received from Rob Rosenberg and other coworkers. First/only employee to tell me of suspected racial differences in pay. Knowledge of my work on the UV project. Witness to his own starting and ending pay as technician and senior technician while at MD.

Maria Tabutt- Only supervising female mechanical engineer. Responsible for the Assembly Documents of the 150 and 75kW US and EU cabinets. Knows of some of the Quality and Documentation related work conducted by me during employment with Defendant. Experienced scrutiny and less cooperation from male employees including Bogdan Proca, Rob Rosenberg, and men on the QA team. Listened to locker room talk from John Wolgemuth. Told during performance evaluations that she could not document her supervision of design engineer despite acting as their supervisor without full pay. First/only employee to tell me of gender differences in pay. Received weekly meetings with HR when they complained about hostile environment caused by new Manager which included performance evaluation issue. Witness to her own starting and ending pay and related negotiations while working at MD.

Frank mcmahon- Manager of Sam Gallagher. May know about his sexual comments/ pressuring me to go to lunch

Sam Gallagher-witness to jokes and comments made by himself, Jorge in relation to race, and himself and Bogdan Proca in relation to gender. witness to his own pay or compensation as R&D engineer.

Seth Wolgemuth- Witness to his own initial and post promotion pay as a technician and senior technician with MD.

Brian Kenney- Issues with Kenney regarding his treatment of me vs white employees which required intervention, he also had issue with Julians work which was categorized as racially biased.

Bogdan Proca- Sexual harassment witness through his own comments and behaviors.

Mike Russell- Sexual harassment witness through his own behavior.

Joren Wendschuh- Knowledge of all claims made due to direct complaints and “journaling” of notes through messages to him in Teams.

Brenda – witness to sexual harassment through behaviors of her QA teammates towards issues escalated by/tasks related to me or Maria.

Alexandra Heisler-wrongful termination, racial discrimination in hiring, compensation.

Patti- wrongful termination, racial discrimination in hiring, compensation.

Thaddeus- in charge of migrating project notes from teamworks to jira, suspected to have seen many details regarding my work/projects

John Wolgemuth: witness to his own comments about women made at work.

Darren-witness to gender discrimination; witness to his own starting pay as a mechanical engineer.

Erik Lydick- witness to gender discrimination; witness to his own starting pay as a mechanical engineer.

Jerry Frank: Asked me for consulting work on substrate, also party to comments made in electrical engineering group chat and comments by John Wolgemuth

Ben – witness to racial hiring practices. Comments made in defense of his sister’s behavior.

Jed Tsada- Knowledge of my work on the UV project

Dan Hackman- Witness to sexual harassment through Sam Gallaghers pressuring for lunch, witness to nature of work as well as racial comments made by coworkers. Fired 10 days after I notified company of suit. Likely to use spousal privilege/avoid testifying as we are legally married.

3. Identify all healthcare professionals, including but not limited to, physicians, psychiatrists, psychologists, therapists, social workers, and other healthcare professionals with whom you consulted or from whom you received or sought treatment since 2018, including but not limited to those consulted regarding any injuries or conditions relating to any injuries or conditions relating to this action.

RESPONSE:

Sanul Corrielus

215-383-5900

702 W Girard Ave, Philadelphia, PA 19123

Chantele Mallory

484-572-4251

201 King of Prussia Rd, Ste 650, Radnor, PA 19087

Yefim Aranbayev

610-853-4350

7922 West Chester Pike, Upper Darby, PA 19082

Christopher Reid
610-527-8140
825 Old Lancaster Rd, #370, Bryn Mawr, PA 19010

Gregory C. Bolton Senior
610-896-4380
100 Lancaster Ave, Wynnewood, PA 19096

Peter Snyder
215-662-9905
51 N 39th St, Philadelphia, PA 19104

Gerald Michael Lemole
215-947-8887
2771 Philmont Ave, Huntingdon Valley, PA 19006

Tara Bussett
610-853-1112
2010 West Chester Pike Suite 350
Havertown, PA 19083

Avani P. Amin
610-708-5575
1502 West Chester Pike Ste 15,
West Chester, PA 19382

Denis Joffe
610-527-1604
825 Old Lancaster Rd #360
Bryn Mawr, PA 19010

Seth Zwillenberg
800-346-7834
5501 Old York Rd Paley, 5501 Old York Building, 2nd Floor,
Philadelphia, PA 19141

Sheri Klock
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Mary Adefemi
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Narberth, PA 19072

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Tony Anene-Maidoh
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774 Christiana Rd #202
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Evelyn Partridge
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1717 Meadow St, Philadelphia, PA 19124

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3400 Civic Center Boulevard
South Pavillion, 2nd Floor, Philadelphia, PA 19104

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7131 Frankford Ave 2nd Floor,
Philadelphia, PA 19135

Nancy Villanueva
800-836-7536
3401 N Broad St Suite D-101, Philadelphia, PA 19140

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215-316-5151
800 Walnut St 9th Floor, Philadelphia, PA 19107

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3624 Market St STE 201,
Philadelphia, PA 19104

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610-527-4896

825 Old Lancaster Road Suite 420
Bryn Mawr, PA 19010

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215-855-2693
700 Horizon Dr Ste 101, Chalfont, PA 18914

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301 West Chester Pike #101,
Havertown, PA 19083

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Walnut Towers, 211 S 9th St Unit 600,
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215-456-6127
5401 Old York Rd SUITE 400,
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Heart Pavilion, Mezzazine Level, 100 E Lancaster Ave, Wynnewood, PA 19096

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Michele Farber
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1900 Market St #115, Philadelphia, PA 19103

James J. Evans
215-955-7000
909 Walnut St, Philadelphia, PA 19107

Xin C. Wang
215-257-4900
920 Lawn Ave, Sellersville, PA 18960

Marianne Ruby
1015 Chestnut St #601, Philadelphia, PA 19107

4. Identify all chat rooms, blogs, online forums, or social media or networking websites, applications, services, software, or platforms (including but not limited to those involving video sharing, photograph sharing, blogging, messaging, or ephemeral messaging) for 11 which you have or had an account, or which you have used someone else's account to conduct activity, from January 1, 2020 through the present.

RESPONSE: linkedin, facebook, Instagram, indeed, monster, Glassdoor, ziprecruiter, careerbuilder.

5. Identify all persons who provided information used, and all documents reviewed or referenced in answering these interrogatories.

RESPONSE: all persons in section 1 have acted as a source or provided information and or documents referenced in these interrogatories. I am now also considering calling all persons in section 1 as potential witnesses to the case.

7. State the amount of damages you are claiming for each cause of action alleged in the Complaint and how the amount was calculated.

RESPONSE: I am claiming the maximum amount for each cause of action for the combination of compensatory and punitive damages.

8. Describe in detail all facts supporting your demand for punitive damages as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my demand for punitive damages.

9. Describe in detail all facts supporting your claims that Defendant discriminated against you based upon race as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of racial discrimination.

10. Describe in detail all facts supporting your claims that Defendant discriminated against you based upon disability as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of disability discrimination.

11. Describe in detail all facts supporting your claims of sexual harassment as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of sexual harassment.

12. Describe in detail all facts supporting your claims of unlawful termination as alleged in your Complaint. RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of unlawful termination.

13. Identify all efforts you have made to find employment beginning in 2017 up to present, with the exception of employment with InductEV, and if applicable, identify by name, address, and telephone number each employer for whom you have worked. RESPONSE: I have not maintained records of every

employment effort from 2017 on. I had fielded numerous recruiter calls screenings, occasional interviews and online resume submissions

Employers

Bryn Mawr College Physics Department
101 N Merion Ave,
Bryn Mawr, PA 19010

Modis staffing agency
1305 Goshen Parkway
west Chester, PA 19380
610-793-8735

Pinnacle Technologies Staffing Agency
2001 US 46 E Waterview Plaza Suite
310 Parsippany NJ 07054
646-688-3623

Onboard Services
50 Millstone Road Building 300
suite 110
East Windsor, NJ 08520
609-945-8000

Insight Global Staffing Agency
855-485-8853
1224 Hammond Drive, Suite 1500
Atlanta, GA 30346

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14. Identify all positions held by you prior to your work at InductEV that you believe reflect or provided to you experience that should have been acknowledged by InductEV for purposes of hiring, or at some point during your employment promoting you into the Senior Technician position. With respect to those positions, please identify the employer, your direct 13 supervisor and/or others who are familiar with your employment and as much directory information as you may have, including but not limited to, name, phone numbers, email, etc. RESPONSE:

Research Assistant- Supervised by Michael Noel
mnoel@brynmawr.edu
610-526-5363

Summer Research Assistant- Supervised by Michael Lim
856-256-4365
lim@rowan.edu

Teaching Assistant- supervised by Mark Matlin email, phone
mmatlin@brynmawr.edu

Private tutor- Frog tutoring where I worked as an independent contractor
Frog Tutoring Corporate Office
1751 River Run Suite 200
Fort Worth, TX 76107
Phone: (877) 904 0134

General Technician- Ron Henry
610-436-5203
linkedin profile
<https://www.linkedin.com/in/ronald-henry-4094aa67/>

R&D Technician and Associate Investigator Roles-
Manager Hjalti Skulason-
805-350-3119
Hjalti.skulason@dupont.com
Supervisor John Allen
302-287-0391
John.allen@dupont.com

II RF Engineer – Supervisor was Nathan Zedan
609-929-9608
I do not know his email address. This is his linked in
<https://www.linkedin.com/in/nathan-zedan-59163437/>

Katherine McQuoid
worked with me while at comcast
happymcquoid@gmail.com

15. With respect to the allegation in Paragraph 144 of the Complaint, please identify the details of the reclassification of the employees identified including the respective positions; your knowledge of Company needs; and your knowledge of pre-existing qualifications and job tasks in association with the reclassification of each individual. RESPONSE:

I have no further knowledge than what was stated in complaint, or attached as supporting exhibits in my Response to motion to dismiss. All details in my complaint and supporting brief and exhibits are details

of the reclassification that I currently possess. I am constantly searching for new knowledge regarding the same.

16. With respect to the allegation in Paragraph 145 of the Complaint, please identify the details of the reclassification of the employees identified including the respective positions; your knowledge of Company needs; and your knowledge of pre-existing qualifications and job tasks in association with the reclassification of each individual. RESPONSE:

I have no further knowledge than what was stated in that paragraph or attached as supporting exhibits in my Response to motion to dismiss. All details in my complaint and supporting brief and exhibits are details of the reclassification that I currently possess. I am constantly searching for new knowledge regarding the same.